

EXHIBIT J

<p>1 UNITED STATES DISTRICT COURT 2 FOR THE DISTRICT OF MASSACHUSETTS 3 MDL Docket No. 1629 4 Master File No. 04-10981 5 ***** 6 IN RE: NEURONTIN MARKETING, SALES 7 PRACTICES AND PRODUCTS 8 LIABILITY LITIGATION 9 ***** 10 THIS DOCUMENT RELATES TO: 11 Bulger v. Pfizer, Inc., Et Al 12 Case No. 07-11426-PBS 13 and 14 Smith, Et Al v Pfizer, Et Al 15 Case No. 05-CV-11515-PBS 16 ***** 17 VIDEOTAPED DEPOSITION OF CHARLES KING, III 18 19 Held At: 20 Greylock McKinnon Associates 21 One Memorial Drive 22 Cambridge, Massachusetts 23 24 October 28th, 2008 25 9:05 A.M. 26 27 Reported By: Maureen O'Connor Pollard, RPR, CLR 28 29 Videographer: William Slater 30</p>	<p>1 INDEX 2 EXAMINATION PAGE 3 CHARLES KING, III 4 BY MR. MISHKIN 5 5 6 EXHIBITS 7 NO. DESCRIPTION PAGE 8 Exhibit 1 Expert report of Charles 9 King, III..... 4 10 Exhibit 2 One page billing document..... 43 11 Exhibit 3 9/16/02 working paper by 12 Charles King, III..... 58 13 Exhibit 4 Copy of article by Mizik and 14 Jacobson..... 150 15 Exhibit 5 4/4/06 retention letter..... 233 16 Exhibit 6 Group of e-mails..... 233 17 18 19 20 21 22 23 24</p>
<p>1 FOR THE PLAINTIFF: 2 BY: RON ROSENKRANZ, ESQ. 3 KEITH ALTMAN, ESQ. 4 FINKELSTEIN & PARTNERS 5 1279 Route 300 6 Newburgh, New York 12551 7 800-634-1212 8 rrosenkrantz@lawampm.com 9 10 FOR THE DEFENDANTS: 11 BY: PAUL S. MISHKIN, ESQ. 12 DAVID POLK & WARDWELL 13 450 Lexington Avenue 14 New York, New York 10017 15 212-450-4000 16 paul.mishkin@dpw.com 17 and 18 BY: NICHOLAS P. MIZELL, ESQ. 19 JAMES P. MUEHLBERGER, ESQ. 20 SHOOK, HARDY & BACON 21 2555 Grand Avenue 22 Kansas City, Missouri 64105 23 816-559-2991 24 nmizell@shb.com</p>	<p>1 PROCEEDINGS 2 3 (Whereupon, King Exhibit Number 1 was 4 marked for identification.) 5 6 THE VIDEOGRAPHER: This is Bill Slater 7 of Veritext. Today's date is October 28th, 8 2008. The time is 9:05 a.m.. 9 We are here at the offices of Greylock 10 McKinnon Associates located at 1 Memorial Drive, 11 Cambridge, Massachusetts to take the videotaped 12 deposition of Charles King, III in the matter of 13 In Re: Neurontin Marketing, Sales Practices and 14 Products Liability Litigation in the United 15 States District Court, District of 16 Massachusetts, MDL Docket Number 1629, Master 17 File Number 04-10981, relating to Bulger versus 18 Pfizer, Incorporated, Et Al, Case Number 19 07-11426-PBS, and Smith, Et Al, versus Pfizer, 20 Et Al, Case Number 05-CV-11515-PBS. 21 Counsel will now voice introduce 22 themselves for the record and state whom they 23 represent, and then the court reporter 24 will swear in the witness.</p>

<p style="text-align: right;">81</p> <p>1 B?</p> <p>2 A. Yes.</p> <p>3 Q. Let's put aside anything that you</p> <p>4 might have received after putting in the report.</p> <p>5 I want to focus with you on the documents that</p> <p>6 you reviewed before you put in your report.</p> <p>7 What other documents besides those</p> <p>8 listed on attachment B did you review in</p> <p>9 connection with your work in this case?</p> <p>10 A. Well, the attorneys provided me with a</p> <p>11 hard drive with a daunting number of documents,</p> <p>12 so there's all sorts of internal company</p> <p>13 memoranda or e-mail communications or marketing</p> <p>14 plans or business plans or publication plans,</p> <p>15 sales analyses, you know, transcripts of</p> <p>16 conversation, contacts with outside medical</p> <p>17 education companies. There is a large body of</p> <p>18 evidence, and I reviewed an awful lot of</p> <p>19 documents. And out of those, I selected these</p> <p>20 as examples or as representatives for the points</p> <p>21 I was trying to make.</p> <p>22 Q. And how did you make that selection?</p> <p>23 A. I tried to find things that I thought</p> <p>24 were the -- made the point most clearly, most</p>	<p style="text-align: right;">83</p> <p>1 Q. All right. And let's look at --</p> <p>2 A. Other than clerical error.</p> <p>3 Q. Okay. Are there other legal documents</p> <p>4 outside of the -- outside of deposition</p> <p>5 transcripts that you specifically relied upon</p> <p>6 for purposes of your opinion in this case that</p> <p>7 are not reflected in this list?</p> <p>8 A. No.</p> <p>9 Q. And then there's another heading here</p> <p>10 "Bates Documents." Are there any Bates</p> <p>11 documents that you specifically relied upon for</p> <p>12 purposes of your opinions expressed in this</p> <p>13 report that are not listed here on attachment B</p> <p>14 under the heading "Bates Documents"?</p> <p>15 A. No.</p> <p>16 Q. Have you reviewed the Bulger or Smith</p> <p>17 amended complaints?</p> <p>18 A. No.</p> <p>19 Q. Do you plan to review them?</p> <p>20 A. I wasn't asked to.</p> <p>21 Q. Do you have any plans to review them</p> <p>22 in the future?</p> <p>23 A. No.</p> <p>24 Q. Have you reviewed the complaints in</p>
<p style="text-align: right;">82</p> <p>1 succinctly, and were representative of what I</p> <p>2 had discovered in reading various documents.</p> <p>3 Q. All right. Let's talk about the</p> <p>4 heading under "Legal Documents." Well, let me</p> <p>5 take a step back first.</p> <p>6 Are there other documents that you are</p> <p>7 relying upon for purposes of your opinion that</p> <p>8 you chose not to include in this list of</p> <p>9 documents relied upon?</p> <p>10 A. You know, there are other documents</p> <p>11 available that support my opinions, but these</p> <p>12 are the ones that, you know, I specifically</p> <p>13 chose to rely upon for the opinions in the</p> <p>14 report.</p> <p>15 Q. Okay. Did you specifically choose to</p> <p>16 rely upon any deposition testimony other than</p> <p>17 the deposition testimony listed here under</p> <p>18 "Legal Documents"?</p> <p>19 A. Well, the answer should be no.</p> <p>20 Q. Okay. And if you look at -- well, you</p> <p>21 said "the answer should be no." Do you have any</p> <p>22 reason to think the answer is something other</p> <p>23 than no?</p> <p>24 A. No, I don't.</p>	<p style="text-align: right;">84</p> <p>1 any of the personal injury cases?</p> <p>2 A. No.</p> <p>3 Q. Are you familiar with the facts in any</p> <p>4 of the individual personal injury cases?</p> <p>5 A. No.</p> <p>6 Q. So I take it you're not offering any</p> <p>7 opinions that are specific to any of the</p> <p>8 particular personal injury cases, is that right?</p> <p>9 A. That's correct, except that the</p> <p>10 opinions that I offer here apply to all doctors,</p> <p>11 so they would apply to the individual doctors in</p> <p>12 the personal injury cases. But I'm not offering</p> <p>13 an opinion to a -- concerning a specific</p> <p>14 personal injury case.</p> <p>15 Q. Have you ever spoken to any of the</p> <p>16 Plaintiffs in the personal injury cases?</p> <p>17 A. No.</p> <p>18 Q. Have you read any of the deposition</p> <p>19 transcripts in the personal injury cases?</p> <p>20 A. No.</p> <p>21 Q. Do you plan to read any of those?</p> <p>22 A. Not unless I'm asked to.</p> <p>23 Q. Do you know who the treating</p> <p>24 physicians were in any of the personal injury</p>